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Reorganized Debtors

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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DPH HOLDINGS CORP., <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
	:	(Jointly Administered)
Reorganized Debtors.	:	
	:	
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NOTICE OF WITHDRAWAL OF REORGANIZED DEBTORS'
FORTY-FOURTH OMNIBUS CLAIMS OBJECTION WITH
RESPECT TO PROOFS OF CLAIM NUMBERS 15669, 15670, AND 16415

("NOTICE OF WITHDRAWAL OF FORTY-FOURTH OMNIBUS CLAIMS OBJECTION
WITH RESPECT TO PROOFS OF CLAIM NUMBERS 15669, 15670, AND 16415")

PLEASE TAKE NOTICE that DPH Holdings Corp. and its affiliated reorganized debtors (collectively, the "Reorganized Debtors"), successors of Delphi Corporation and certain of its subsidiaries and affiliates including Delphi Automotive Systems LLC ("DAS LLC"), former debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), objected to proofs of claim numbers 15669, 15670, and 16415 (the "Proofs of Claim"), filed by ATS Automation Tooling Systems, Inc., ATS Michigan Sales and Service Inc., and ATS Automation Tooling Systems, Inc., respectively, (collectively, "ATS") and subsequently transferred to Longacre Master Fund, Ltd. ("Longacre," together with ATS, the "Claimants") pursuant to the Reorganized Debtors' Forty-Fourth Omnibus Objection Pursuant To 11 U.S.C. § 502(b) And (d) And Fed. R. Bankr. P. 3007 To (I) Modify And Allow (A) Certain Modified And Allowed Claims, (B) A Partially Satisfied Claim, And (C) Certain Partially Satisfied Scheduled Liabilities, (II) Disallow And Expunge (A) Certain Fully Satisfied Scheduled Liabilities, (B) Certain MDL-Related Claims, (C) Certain Union Claims, (D) Certain Personal Injury Claims, And (E) A Duplicate Claim, (III) Object To Certain (A) Preference-Related Claims And (B) Preference-Related Scheduled Liabilities, And (IV) Modify Certain SERP-Related Scheduled Liabilities (Docket No. 19395) (the "Forty-Fourth Omnibus Claims Objection").

PLEASE TAKE FURTHER NOTICE that on October 6, 2009, the Debtors substantially consummated the First Amended Joint Plan Of Reorganization Of Delphi Corporation And Certain Affiliates, Debtors And Debtors-In-Possession, As Modified (the "Modified Plan"), which had been approved by the United States Bankruptcy Court for the Southern District of New York pursuant to an order entered on July 30, 2009 (Docket No. 18707), and emerged from chapter 11 as the Reorganized Debtors. In connection with the

consummation of the Modified Plan, Delphi and DAS LLC emerged from chapter 11 as DPH Holdings Corp. and DPH-DAS LLC, respectively.

PLEASE TAKE FURTHER NOTICE that Article 9.6(a) of the Modified Plan provides that "[t]he Reorganized Debtors shall retain responsibility for administering, disputing, objecting to, compromising, or otherwise resolving all Claims against, and Interests in, the Debtors and making distributions (if any) with respect to all Claims and Interests."

PLEASE TAKE FURTHER NOTICE that the Reorganized Debtors are withdrawing the Forty-Fourth Omnibus Claims Objection with respect to the Proofs of Claim.

PLEASE TAKE FURTHER NOTICE that in accordance with Articles 1.9 and 9.6(b) of the Modified Plan and 11 U.S.C § 502, the withdrawal of the Forty-Fourth Omnibus Claims Objection with respect to the Proofs of Claim will result in (i) proof of claim number 15669 being allowed as a general unsecured non-priority claim in the amount of \$155,334.07 against DPH-DAS LLC in accordance with the terms of the Modified Plan, (ii) proof of claim number 15670 being allowed as a general unsecured non-priority claim in the amount of \$207,886.00 against DPH-DAS LLC in accordance with the terms of the Modified Plan, and (iii) proof of claim number 16415 being allowed as a general unsecured non-priority claim in the amount of \$1,983,000.00 against DPH-DAS LLC in accordance with the terms of the Modified Plan pursuant to the Order Pursuant To 11 U.S.C. § 503(b) And Fed. R. Bankr. P. 3007 Disallowing And Expunging Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected On Debtors' Books And Records, (C) Untimely Claims And Untimely Tax Claim, And (D) Claims Subject To Modification, Tax Claims Subject To Modification, And Modified Claims Asserting Reclamation Identified In Fifteenth Omnibus Claims Objection (Docket No. 8443).

Dated: New York, New York
March 30, 2011

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